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6 7 8 9 10 11	DAVID PRIEBE (Bar No. 148679) DLA PIPER US LLP 2000 University Avenue East Palo Alto, CA 94303 Telephone: (650) 833-2000 Facsimile: (650) 833-2001 Email: david.gross@dlapiper.com	
13 14 15	NORTHERN D	ATES DISTRICT COURT ISTRICT OF CALIFORNIA JOSE DIVISION
16 17 18 19 20 21 22 23 24 25 26 27 28	IN RE TRIDENT MICROSYSTEMS, INC. DERIVATIVE LITIGATION This Document Relates to: ALL ACTIONS. EM\(7217234.2\)	LEAD CASE NO. C06-3440-JF STIPULATION AND [PROPOSED] ORDER ENLARGING TIME FOR NOMINAL DEFENDANT TRIDENT MICROSYSTEMS, INC. TO RESPOND TO COMPLAINT AND ALLOWING PLAINTIFFS TO AMEND COMPLAINT
DLA PIPER US LLP		STIPULATION LEAD CASE NO. C06-3440-JF

1 **STIPULATION** 2 WHEREAS, lead plaintiffs Viken Kalindjian and Gerald W. Keeney, on behalf of 3 themselves and all others similarly situated ("Lead Plaintiffs"), filed their First Amended 4 Consolidated Verified Shareholder Derivative Complaint ("Amended Complaint") on March 7, 5 2007; and 6 WHEREAS, pursuant to this Court's February 9, 2007 Order, nominal defendant Trident 7 Microsystems, Inc.'s ("Trident") response to the Amended Complaint is due by April 16, 2007; 8 and 9 WHEREAS, by the parties' stipulation and Court order dated March 22, 2007, in the event 10 that Trident responds by a motion to dismiss the Amended Complaint for failure to plead that 11 making a demand would have been futile (pursuant to Fed. R. Civ. P. 23.1), Lead Plaintiffs must 12 file and serve their opposition within forty-five (45) days after service of Trident's motion, and 13 Trident must file and serve a reply to Lead Plaintiffs' opposition within fifteen (15) days after 14 service of the opposition; 15 WHEREAS, Trident requested of Lead Plaintiffs an extension of time to respond to the 16 Amended Complaint in order to complete its internal investigation and determine the appropriate 17 response; and 18 WHEREAS, Lead Plaintiffs agreed to Trident's request; 19 THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS: 20 1. Trident's date to respond to the Amended Complaint will be extended from April 21 16 to April 30, 2007. 22 2. The dates for the opposition and reply briefs (should Trident file a motion to 23 dismiss) will remain the same, i.e., forty-five (45) days after service of Trident's motion and 24 fifteen (15) days after service of Plaintiffs' opposition, respectively. 25 26 27 28 -1-

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1	Dated: April 16, 2007	DLA PIPER US LLP
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3		By _/s/ David Priebe DAVID PRIEBE
4		Attorneys for Nominal Defendant
5		Trident Microsystems, Inc.
6	Dated: April 16, 2007	LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP
7		
8		By _/s/ Shawn A. Williams SHAWN A. WILLIAMS
9		MONIQUE C. WINKLER AELISH M. BAIG
10		and
11		SCHIFFRIN BARROWAY TOPAZ
12		& KESSLER, LLP ERIC L. ZAGAR ROPIN WINCHESTER
13		ROBIN WINCHESTER JAMES A. MARO
14		Co-Lead Counsel for Plaintiffs
15		
16	IT IS SO ORDERED.	
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19 20	DATED:4/17/07	THE HONORAB LEJEREMY FOGE: UNITED STATE: DISTRICT JUDGE
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		LEAD CASE NO. C06-3440-JF

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1	I, DAVID PRIEBE, am the ECF User whose ID and password are being used to file this		
2	STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I		
3	hereby attest that SHAWN A. WILLIAMS has concurred in this filing.		
4			
5	Dated: April 16, 2007 DLA PIPER US LLP		
6			
7	By /s/ David Priebe DAVID PRIEBE		
8	Attorneys for Nominal Defendant Trident Microsystems, Inc.		
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